

**IN THE UNITED STATES BANKRUPTCY COURT
Eastern District of Virginia
Richmond Division**

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|---|---|----------------------------|
| In re: Shirley Dean Taylor |) | |
| Debtor |) | Case No. 17-30142-KRH |
| |) | Chapter 13 |
| <hr/> | | |
| SHIRLEY DEAN TAYLOR, |) | |
| |) | |
| Plaintiff, |) | |
| v. |) | |
| |) | Adv. Pro. No. 18-03003-KRH |
| ALLIED TITLE LENDING, LLC d/b/a ALLIED |) | |
| CASH ADVANCE, and |) | |
| |) | |
| CERASTES, LLC, |) | |
| |) | |
| Defendants. |) | |
| |) | |

**COMMONWEALTH'S MOTION FOR LEAVE TO FILE PLEADINGS IN
INTERVENTION**

The Plaintiff-Intervenor, Commonwealth of Virginia, by, through, and at the relation of the Attorney General of Virginia, Mark R. Herring (the “Intervenor” or the “Commonwealth”), hereby moves to intervene in the above-captioned civil action pursuant to Rule 7024 of the Federal Rules of Bankruptcy Procedure and Rule 24(b) of the Federal Rules of Civil Procedure. A true and accurate copy of the Commonwealth’s proposed Complaint in Intervention is attached as Exhibit A, and its Opposition to the Motion to Dismiss filed by Allied Title Lending, is attached as Exhibit B.

In support of its motion, the Commonwealth states that it meets all criteria for intervention pursuant to Rule 24(b) and further relies upon its accompanying memorandum of law.

WHEREFORE, the Commonwealth respectfully requests to intervene in this action pursuant to Rule 24(b) as the Plaintiff-Intervenor.

COMMONWEALTH OF VIRGINIA,
EX. REL. MARK R. HERRING,
ATTORNEY GENERAL

By: /s/ Erin E. Witte

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Certificate of Service

I hereby certify that on the 8th day of November 2018, a true and accurate copy of the foregoing Motion for Leave to File Pleadings in Intervention was delivered via email and/or the electronic case filing (ECF) system to the following:

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